

**REMARKS**

Reconsideration is respectfully requested.

As discussed telephonically with the Examiner on December 22, 2004, the latest Office Action is a substantial duplication of the previous Office Action mailed on March 10, 2004, which was responded to on June 10, 2004. The only changes that could be found were in paragraph 4, wherein parenthetical information was added to identify specific features of the Hall reference being relied upon in the rejection. In particular, the claimed "feature server" is now said to correspond to the "PDN" of Hall's Fig. 1 and the claimed "feature service request" is said to correspond to the "packet data communication request" mentioned in Hall.

As set forth in response to the fourth Office Action, a common feature of each of the rejected claims is that service feature information for wireless devices can be provided without use of a VLR by storing such information in a centralized location associated with a data network, namely, a feature server located in a home network that is accessible via the data network. Note that the home network can be a wireless network or could be part of the data network itself, as shown by the three feature server examples in Applicants' Fig. 2. Regardless of the nature of the feature server's home network, service features for wireless devices are obtained by sending service feature requests from a wireless telecommunication network into the data network, e.g., via a wireless network switch that is connected to the data network, for delivery to the feature server in the home network. This avoids having to maintain VLRs and the overhead associated with the usual HLR/VLR intercommunication messaging.

The Sallberg reference lacks any teaching or suggestion of accessing a data network for the purpose of obtaining wireless device service feature information. In fact, it does not seem to have anything to do with feature service lookups at all. As shown in Fig. 3A, and as described in

paragraph 0025, Sallberg is directed to a system wherein a mobile station 300 that is connected to the Internet 390 can receive voice calls by requesting a voice gateway feature 325 to forward incoming calls from the PSTN 350 to a voice gateway 340 that converts the calls to IP format so they can be received at the mobile station while it is in the IP communication mode. The Internet 390 is the only data network shown in Sallberg, and it plays no role in the functioning of Sallberg's call forwarding system. The Internet 390 is shown for the sole purpose of illustrating that the mobile station 300 is connected thereto, presumably for conventional purposes such as Web surfing, email, etc.

As acknowledged on page 3, lines 13-20 of the Office Action, "Sallberg . . . does not disclose accessing a packet data network from a wireless network by issuing a feature service request into said packet data network for administering service features for a wireless call without use of a VLR to or from a wireless terminal in a home network; managing all service features in a central location by delivering said feature request to a feature server located in said home network." However, the Office cites Hall as teaching "accessing by a (MSC) (i.e., a switch) into a packet data network (packet data network or internet protocol base network) (fig. 1) from a wireless network (radio network) (fig. 1) by issuing a feature service request (packet data communication request) into said packet data network (packet data, internet protocol base network, internet) for administering service features (packet data communication request) for a wireless call without use of a VLR to or from a wireless terminal (ms) (fig. 1) in a home network (i.e., the HLR, MSC and the base station with is connected to the mobile station (fig. 1 and col. 7, lines 15-50 and col. 11 lines 3-6); managing all service features in a central location (MSC) by delivering said feature service request to a feature server (PDN), located in said home network

(i.e., the HLR, MSC and the base station with is connected to the mobile station) ( fig. 1 and col. 7 lines 24-50)." Office Action, page 3, line 20 to page 4, line 12.

Hall is directed to a system and method wherein an MSC routes speech/circuit data via another MSC connected to the PSTN, and also routes packet data via a PDN (packet switch) connected to the Internet. The Hall MSC does not appear to send feature service requests into the Internet or any other data network. For one thing, Hall doesn't show any feature server connected to the Internet or other data network. Instead, as stated at column 7, lines 33-36 and 42-45, and as shown in Hall's Fig. 1, the MSC connects to a conventional HLR. It uses the HLR to perform packet data service subscription checks. This is the only feature service mentioned in the cited passage spanning column 7, lines 15-50 of Hall.

The additional parenthetical information added to paragraph 4 of the current Office Action does not change the analysis. There no basis for concluding that the PDN in Hall's Fig. 1 is a feature server insofar as no such functionality is ascribed to that element (channel registration (col. 11, lines 3-5) is not feature service). As stated, the only feature service information mentioned in Hall is the packet data service subscription information provided by Hall's HLR upon Hall's MSC requesting a lookup. This feature service lookup is said to occur "in conjunction with a packet data communication request" (column 7, lines 33-36). Hall does not state that the packet data communication request itself is a feature service request. At best, Hall suggests that the packet data communication request may cause the MSC to consult the HLR. Moreover, even if the packet data communication request can somehow be considered comprise, embody, or contain a feature service request, there is no involvement of the PDN in providing a service feature response insofar as Hall plainly states that this is the job of the HLR.

As such, it appears that Hall does not supply the missing limitation of Sallberg of "accessing . . . a packet data network from a wireless network by issuing a feature service request into said packet data network [and] . . . managing all service features in a central location by delivering said feature request to a feature server . . . ." Thus, the rejections under 35 U.S.C. 103, all of which are based on Sallberg and Hall, do not appear to properly support a conclusion of obviousness.

The independent claims have all been amended to respond to the claim objection of paragraph 2 of the Office Action. Thus, the term "VLR" is now described parenthetically in each independent claims as a "Visitor Location Register").

In view of the foregoing, Applicant respectfully requests that the rejections be withdrawn, and that Notices of Allowability and Allowance be duly issued.

A Change of Correspondence Address Request form is attached hereto.

Respectfully submitted,



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